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September 24, 2024

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Federal Trade Commission v. Tapestry, Inc.*, No. 1:24-cv-03109-JLR: Letter  
Motion To Seal**

Dear Judge Rochon,

Pursuant to Rule 4(B)(iii)(c) of this Court's Individual Rules of Practice in Civil Cases and Paragraph 9 of the Stipulated Protective Order (ECF No. 70), Defendants Tapestry, Inc. ("Tapestry") and Capri Holdings Limited ("Capri") respectfully move this Court to permit Defendants to file under seal their Post-Hearing Proposed Findings of Fact and Conclusions of Law.

The Post-Hearing Proposed Findings of Fact and Conclusions of Law contains information designated by various third parties as Confidential Material under Paragraph 1(a) of the Stipulated Protective Order, and which the Court has ordered to remain under seal. *See* ECF No. 321. Defendants previously met and conferred with counsel for these third parties regarding this information, pursuant to the Court's Rule of Individual Practice 4(B)(iii), when listing the relevant materials on their exhibit list and submitting the Pre-Hearing Proposed Findings of Fact and Conclusions of Law.

Defendants respectfully request that the Court enter an order granting this motion and sealing those portions of the Post-Hearing Proposed Findings of Fact and Conclusions of Law containing Confidential Material. Defendants will concurrently file a public version of their Post-Hearing Proposed Findings of Fact and Conclusion of Law that redacts any Confidential Material.

LATHAM & WATKINS<sup>LLP</sup>

Respectfully submitted,

/s/ Alfred C. Pfeiffer

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cc: All Counsel of Record (via ECF)

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<sup>1</sup> Electronic signatures used with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.